

09/662,399

MS147164.01/MSFTP128US

REMARKS

Claims 1-45 are currently pending in the subject application and are presently under consideration. Claims 1-39 and 40-45 have been amended as shown on pages 2-12 of the Submission.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

**I. Rejection of Claims 16, 23, 30, 32-35, 37, 38, 41-43, and 45 Under 35 U.S.C. §102(b)**

Claims 16, 23, 30, 32-35, 37, 38, 41-43, and 45 stand rejected under 35 U.S.C. §102(b) as being anticipated by Oppenheim (U.S. 5,734,905). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Oppenheim fails to disclose each and every element recited in the subject claims.

A single prior art reference anticipates a patent claim only if it expressly or inherently describes each and every limitation set forth in the patent claim. *Trintec Industries, Inc., v. Top-U.S.A. Corp.*, 295 F.3d 1292, 63 U.S.P.Q.2D 1597 (Fed. Cir. 2002); *See Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the ... claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

The subject invention relates to providing a mapping between a source object and a target object through utilization of a function object. To that end, amended claim 16 recites *graphically associating a source object node with an input... of a function object... using a user interface selection device, the source object node displayed hierarchically amongst a plurality of source object nodes, and graphically associating a target object node with an output... of the function object... using the user interface selection device, the target object node displayed hierarchically amongst a plurality of target object nodes*. Amended independent claims 32, 41, 42, and 43 also recite elements relating to hierarchical arrangements of source object nodes and target object nodes. Amended independent claims 33 and 45 recite elements indicating that the source object node and the target object node conform to different schemas.

09/662,399

MS147164.01/MSFTP128US

In contrast to the claimed invention, Oppenheim discloses systems and/or methods that enable a user to link applications in a manner that causes data flowing through one application to be automatically routed to another application for further processing. (See col. 8, lines 34-36). The applications, however, are not displayed hierarchically, as such applications can be operated independent of one another. In an example of the aforementioned linking, Oppenheim discloses that an analog to digital converter object can be linked with a signal processor object, thereby causing an output of the analog to digital converter object to be employed as input to the signal processor object. (See col. 8, lines 38-53). Oppenheim further discloses that a third application object can be linked to the above-mentioned analog to digital converter object and signal processor object, so that output of the signal processor object is utilized as input to the third object (e.g., a filter object). In summary, the analog to digital converter object creates an output that is utilized as input with respect to the signal processor object; the output of the signal processor object is received as input to the filter object, and output of the filter object can be directed towards a different object or stored in a pre-determined location. As stated above, however, the applications are independent and not *displayed hierarchically* amongst a plurality of disparate applications (much less amongst a plurality of *source object nodes*). Additionally, the applications described in Oppenheim do not include nodes (e.g., a source object node and/or a target object node), and even if such nodes were included, there is no disclosure within Oppenheim that the nodes would conform to separate schemas.

Accordingly, applicants' representative respectfully submits that Oppenheim fails to disclose each and every element of applicants' invention as recited in independent claims 16, 32, 33, 41-43, and 45 (and all claims that depend therefrom), and thus fails to anticipate the claimed invention. In view of at least the foregoing, it is respectfully requested that this rejection be withdrawn.

**II. Rejection of Claims 1-15, 17-22, 24-27, and 44 Under 35 U.S.C. §103(a)**

Claims 1-15, 17-22, 24-27, and 44 stand rejected under U.S.C. §103(a) as being unpatentable over Oppenheim in view of Microsoft's "Component Object Model" (COM) specification. It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Oppenheim and Microsoft's COM specification, alone or in combination, fail to teach or suggest each and every element of applicants' claimed invention.

09/662,399

MS147164.01/MSFTP128US

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. See *In re Vaack*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Claim 1 (in a similar manner to claim 16) has been amended to recite *a source object node being one of a plurality of hierarchically displayed nodes and a target object node being one of a plurality of hierarchically displayed nodes*. As described *supra*, Oppenheim fails to disclose a hierarchical arrangement of source object nodes and a hierarchical arrangement of target object nodes. Microsoft's COM specification fails to make up for these deficiencies. Accordingly, it is readily apparent that this rejection should be withdrawn.

### **III. Rejection of Claims 28, 29, and 31 Under 35 U.S.C. §103(a)**

Claims 28, 29, and 31 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Oppenheim in view of Jordan (US 5,778,227). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Jordan fails to make up for the deficiencies of Oppenheim *vis a vis* applicants' claimed invention regarding independent claim 16 (upon which the subject claims depend). In particular, Jordan discloses a system and/or methodology that provides existing applications with additional functionality (e.g., creation and deletion of database objects). Like Oppenheim, however, Jordan fails to disclose, teach, or suggest *graphically associating a source object node with an input... of a function object... using a user interface selection device, the source object node displayed hierarchically amongst a plurality of source object nodes, and graphically associating a target object node with an output... of the function object... using the user interface selection device, the target*

09/662,399

MS147164.01/MSFTP128US

*object node displayed hierarchically amongst a plurality of target object nodes* as recited in independent claim 16.

Accordingly, applicants' representative respectfully submits that Oppenheim and Jordan, alone or in combination, fail to teach or suggest all elements of applicants' invention as recited in claims 28, 29, and 31. Therefore, it is readily apparent that this rejection should be withdrawn.

**IV. Rejection of Claims 36, 39, and 40 Under 35 U.S.C. §103(a)**

Claims 36, 39, and 40 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Oppenheim in view of Faustini (US 6,496,870). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. The subject claims depend upon claim 33, and Faustini fails to make up for the aforementioned deficiencies of Oppenheim with respect to claim 33. Therefore, it is readily apparent that this rejection should be withdrawn.

09/662,399

MS147164.01/MSFTP128US


CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited. In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP128US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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